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7 *Attorneys for Plaintiff Kelly-Harrison, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KELLY-HARRISON, INC., an Oregon corporation,  
v.  
Plaintiff,

WCM & ASSOCIATES, INC., a California corporation,  
v.  
Defendants.

WCM & ASSOCIATES, INC., a foreign corporation,  
v.  
Counterclaimant

KELLY-HARRISON, INC. an foreign corporation; DOES INDIVIDUALS I-X; and ROE ENTITIES XI-XX,  
v.  
Counter-defendants

WCM & ASSOCIATES, INC., a foreign corporation,  
v.  
Third-Party Plaintiff

ARCH INSURANCE COMPANY, as Surety  
v.  
Third-Party Defendant

Case No.: 2:24-cv-1752

**STIPULATION AND ORDER TO  
EXTEND PROPOSED JOINT  
DISCOVERY PLAN DEADLINE  
(First Request)**

**STIPULATION AND ORDER TO EXTEND PROPOSED JOINT DISCOVERY PLAN**

## DEADLINE

**(FIRST REQUEST)**

1 IT IS HEREBY STIPULATED AND AGREED by and between KELLY-HARRISON,  
 2 INC., and WCM & ASSOCIATES, INC., by and through their counsel request that the  
 3 Proposed Discovery Plan Deadline in this matter be extended pursuant to LR IA 6-1 and LR IA  
 4 6-2.

5 The parties hereby stipulate and agree to extend the deadline to submit their Proposed  
 6 Joint Discovery Plan Deadline to **January 8, 2025**. The prior deadline to submit the Proposed  
 7 Joint Discovery Plan Deadline was December 23, 2024; however, the parties were unable to  
 8 meet this deadline due to scheduling conflicts caused by the holiday season. These conflicts  
 9 have significantly limited the availability of both parties' counsel for the conference, and the  
 10 parties have been unable to coordinate a mutually convenient time to meet and hold the Rule  
 11 26(f) conference within the original timeframe.

12 **IT IS SO STIPULATED AND AGREED**

13 Dated: December 23, 2024

14 **DOBBERSTEIN LAW GROUP**

15  
 16 By: /s/ Quoc Thai  
 17 Eric Dobberstein, Esq.  
 Quoc Thai, Esq.  
 18 9480 S. Eastern Ave., Suite 225  
 Las Vegas, Nevada 89123  
 19 *Attorneys for Defendant and  
 Counterclaimant, and Third-party Plaintiff*

Dated: December 23, 2024

**MEAD LAW GROUP LLP**

16  
 17 By: Leon F. Mead II, Esq.  
 M. Dason Coronado, Esq.  
 18 7251 W Lake Mead Blvd., Suite 460  
 Las Vegas, Nevada 89128  
 19 *Attorneys for Plaintiff Kelly-Harrison, Inc.*

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 22 IT IS SO ORDERED.  
 23 Dated: December 27, 2024

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 Nancy J. Koppe  
 United States Magistrate Judge